

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SS&C Technologies Holdings, Inc.,

Plaintiff,

v.

AIG Specialty Insurance Company,

Defendant.

Civil Action No. 19-cv-07859 (JSR)

ORAL ARGUMENT REQUESTED

**PLAINTIFF'S PRELIMINARY PRETRIAL
DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(A)(3)**

Plaintiff SS&C Technologies Holdings, Inc. ("SS&C"), pursuant to Fed. R. Civ. P. 26(a)(3) and Judge Rakoff's Individual Practices Rule 4(a), hereby makes the following disclosures.

I. Rule 26(a)(3)(A)(i) – SS&C's Preliminary Trial Witness List

At this time, SS&C identifies the following witnesses for trial:

| | WITNESS, employer | WILL CALL | MAY CALL | ADDRESS |
|----|--|----------------------|---------------------|--|
| 1. | Christopher Wolfe, AIG Specialty Insurance Company ("AIG") | X | | 175 Water Street, 7th Floor, New York, NY 10038, (212) 458-1418 |
| 2. | Kris Ann Cappelluti, AIG | X | | 175 Water Street, 7th Floor, New York, NY 10038, (212) 458-6225 |

| | | | | |
|----|---|----------|----------|--|
| 3. | AIG's Corporate Representative(s) at trial; AIG | X | | |
| 4. | Jeffrey Kalustian (by deposition), AIG | | X | 99 High Street, 25th Floor, Boston, MA 02110, (617) 235-7910 |
| 5. | SS&C's Corporate Representative at trial, SS&C | X | | |
| 6. | Paul Igoe (by deposition), Excelitas Technologies (formerly SS&C) | | X | 3 Pine Tree Lane, Lincoln, RI 02865 (781) 522-5958 |
| 7. | Thomas Martocci (by deposition), SS&C | | X | 80 Lamberton Road, Windsor, CT 06095, (860) 298-4660 |
| 8. | Matthew Balemian (by deposition), SS&C | | X | 80 Lamberton Road, Windsor, CT 06095, (860) 298-4881 |

SS&C reserves the right to modify, amend, or supplement this list prior to or during trial based on case developments, including but not limited to the right to: (1) not call some of the witnesses listed above, (2) call some of the witnesses above by prior trial testimony, (3) call live or by deposition as its witnesses at trial any witness identified on AIG's witness list, (4) call live any witnesses necessary to authenticate or lay the foundation for the introduction of documents to which AIG objects, (5) add additional witnesses to testify live or by prior trial testimony, or by deposition, (6) introduce deposition testimony or prior trial testimony as impeachment evidence or in rebuttal, or (7) change a witness from a live witness to a witness testifying by prior trial testimony, (8) change a witness from a live witness to a witness testifying by deposition, and vice versa. Plaintiffs further reserve the right to supplement or modify this list (1) if any further depositions are taken in this matter, or (2) in response to rulings by the Court (including on any motions). Plaintiffs include in this list individuals who may be listed on AIG's witness list without prejudice to its right to object to AIG's presentation of those witnesses at trial, the

admissibility of all or part of those witnesses' testimony, or its right to move for the exclusion of those witnesses' testimony.

II. Rule 26(a)(3)(A)(ii) – SS&C's Preliminary Deposition Designations

| Name | Begin Page | Begin Line | End Page | End Line | Notes (partial line designations; exhibits introduced) |
|------------------------------|-------------------|-------------------|-----------------|-----------------|---|
| Jeffrey Kalustian | 5 | 18 | 5 | 20 | |
| | 8 | 18 | 10 | 24 | |
| | | | | | Discussing Kalustian Ex. 3, the Underwriting Analysis (AIG- 005796) |
| | 29 | 9 | 29 | 13 | |
| | 33 | 13 | 35 | 3 | |
| | 40 | 21 | 41 | 9 | |
| | 49 | 24 | 50 | 5 | Discussing Kalustian Ex. 5 |
| | 54 | 21 | 57 | 16 | Discussing Kalustian Ex. 7 (AIG-ESI- 07678) |
| Matthew Balemian | 94 | 12 | 95 | 3 | |
| | 11 | 6 | 11 | 23 | |
| | | | | | Discussing Ex. 12, the Services Agreement |
| | 13 | 13 | 14 | 22 | |
| | 20 | 13 | 20 | 23 | Discussing Balemian Ex. 13, SS&C's third party complaint |
| | 21 | 16 | 22 | 11 | |
| | 44 | 14 | 45 | 22 | Discussing Balemian Ex. 19 (SS&C- COV- 0041989) |

| | | | | | |
|------------------------|----|----|----|----|---------------|
| | 49 | 12 | 50 | 22 | |
| Thomas Martocci | 5 | 19 | 6 | 7 | |
| | 8 | 8 | 8 | 16 | |
| | 18 | 19 | 18 | 23 | |
| | 11 | 5 | 12 | 6 | |
| | 21 | 1 | 21 | 11 | |
| Paul Igoe | 14 | 3 | 14 | 21 | |
| | | | | | Discussing |
| | 52 | 20 | 53 | 6 | Ex. 4, the |
| | 61 | 6 | 62 | 5 | Denial Letter |

Plaintiff reserves the right to supplement or modify these designations, including, but not limited to, the right to supplement this list with additional deposition designations for witnesses on AIG's "will call" witness list who are not called to testify at trial. Plaintiff also reserves the right to reduce the amount of designated testimony for any listed witness for any reason.

III. Rule 26(a)(3)(A)(iii) – SS&C's Preliminary Trial Exhibit List

| Exhibit Number | Description | Bates Range |
|-----------------------|--|-------------------------|
| PX-001 | SS&C Policy No. 01-274-16-88 from 4/30/2015 to 4/30/2016 | AIG-000001 - AIG-000131 |
| PX-002 | Email from A. Roxland (AON) to SS&C Claims re Notice - SS&C (Tillage Commodity Fund - Wire) E&O (including attachment: Aon Letter to AIG re Tillage Commodity Fund Fraudulent Wire Transfer) | AIG-000132 - AIG-000136 |
| PX-003 | Summary of SS&C Policy No. 01-274-16-88 | AIG-000137 - AIG-000141 |
| PX-004 | Letter from B. Conlin (AIG) to A. Roxland (AON) re SS&C Claim No. 9774577298US | AIG-000291 |
| PX-005 | Email from L. Raymond (AIG) to P. Igoe (SS&C) re 9774577298US Tillage Commodity Fund - Wire (including attachment: Letter from AIG to SS&C) | AIG-000295 - AIG-000298 |
| PX-006 | Email chain from M. Brandi (AIG) to P. Igoe (SS&C) re Notice - SS&C (Tillage Commodity Fund - Wire) - Crime - Claim No. | AIG-000302 - AIG-000303 |

| | | |
|--------|--|---|
| PX-007 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re SS&C Claim Number 9774577298US | AIG-000371 - AIG-000377 |
| PX-008 | Letter from K.A. Cappelluti (AIG) to P. Igoe (SS&C) re Claim No. 9774577298US | AIG-000382 - AIG-000388; AIG-ESI-00060 - AIG-ESI-00065 |
| PX-009 | Email chain from K.A. Cappelluti (AIG) to FL-DropFile re Claimant: Tillage Commodity - AIG Claim 9774577298us (including attachment: Air Letter to P. Igoe) | AIG-000395 - AIG-000401 |
| PX-010 | Email chain from K.A. Cappelluti (AIG) to FL-DropFile re Claimant: Tillage Commodity (including attachment: AIG Letter to P. Igoe) | AIG-000402 - AIG-000409 |
| PX-011 | Email chain from K.A. Cappelluti (AIG) to FL-DropFile re SS&C Claim Number 9774577298US forwarding M. Kelly November 17, 2016 email chain | AIG-000481 - AIG-000486 |
| PX-012 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re SS&C Claim Number 9774577298US (including attachment: Order on SS&C Motion to Dismiss dated 12/30/2016, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-000497 - AIG-000509 |
| PX-013 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: mediation | AIG-000699 |
| PX-014 | Email chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage v. SS&C -- Claim Number 9774577298US forwarding M. Kelly Jun 4, 2017 email chain | AIG-000724 - AIG-000725 |
| PX-015 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage v. SS&C -- Claim Number 9774577298US | AIG-000845 |
| PX-016 | Email Chain from K.A. Cappelluti to M. Kelly and P. Spagnoletti re Tillage Settlement Discussion AIG Claim 9774577298us | AIG-000905 - AIG-000906; SS&C-COV-0046270 - SS&C-COV-046271 |
| PX-017 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: Tillage Commodities-SS&C | AIG-000907 - AIG-000908 |
| PX-018 | Affirmation and Exhibits in Support of SS&C Technologies, Inc.'s Amended Third-Party Complaint and Opposition to Third-Party Defendants' Motion to Dismiss (Docket. No. 75, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, | AIG-001473 - AIG-001488 |

| | | |
|--------|--|-------------------------|
| | Supreme Court of New York) | |
| PX-019 | Agreement to Provide Administration Services between SS&C Technologies, Inc. and Tillage Commodities Management, LLC | AIG-001476 - AIG-001488 |
| PX-020 | Reply Memorandum of Law in Further Support of Third-Party Defendants Tillage Commodities, LLC and Tillage Commodities Management, LLC's Motion to Dismiss the Amended Third-Party Complaint (Docket. No. 82, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-001845 - AIG-001862 |
| PX-021 | Email Chain from K.A. Cappelluti (AIG) to J. White (SS&C) re SS&C Claim Number 9774577298US | AIG-002136 - AIG-002138 |
| PX-022 | Expert Report of Raymond O'Neill (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-002330 - AIG-002367 |
| PX-023 | Affidavit of Matthew Balemian (Docket. No. 141, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-002722 - AIG-002727 |
| PX-024 | Affidavit of Thomas Martocci (Docket. No. 170, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-002754 - AIG-002763 |
| PX-025 | Davis Polk Presentation titled "Tillage Commodities Fund v. SS&C Technologies, Analysis of Mock Trial" | AIG-003041 - AIG-003057 |
| PX-026 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: SS&C v. Tillage | AIG-003103 - AIG-003106 |
| PX-027 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Insured: SS&C Technologies / Tillage Commodity Fund - 9774577298US forwarding Seligman July 9, 2019 email chain | AIG-003146 - AIG-003159 |
| PX-028 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage: Claim Number 9774577298 US/Settlement forwarding Wolfe March 18, 2019 email chain | AIG-003205 - AG-003209 |

| | | |
|--------|--|-------------------------|
| PX-029 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage: Claim Number 9774577298 US/Settlement | AIG-003227 - AG-003229 |
| PX-030 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Insured: SS&C Technologies / Tillage Commodity Fund - 9774577298US forwarding Wolfe May 22, 2019 email chain | AIG-003284 - AIG-003297 |
| PX-031 | Email from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Meyer June 26, 2017 email (including attachment: June 22, 2017 Order on Motion to Dismiss in the Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016 action) | AIG-003479 - AIG-003485 |
| PX-032 | Memorandum of Law in Opposition to Motion to Dismiss (Docket. No. 10, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-003612 - AIG-003642 |
| PX-033 | Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re 9774577298US FW: Tillage negotiations forwarding Igoe August 14, 2017 email | AIG-004088 |
| PX-034 | Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Wolfe June 18, 2018 email chain | AIG-004090 - AIG-004093 |
| PX-035 | Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Wolfe June 19, 2018 email chain | AIG-004094 - AIG-004097 |
| PX-036 | Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Kelly February 1, 2019 email chain | AIG-004100 - AIG-004105 |
| PX-037 | Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Cruz June 26, 2018 email chain | AIG-004168 - AIG-004172 |
| PX-038 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage: Claim Number 9774577298 US/Settlement forwarding Wolfe March 18, 2019 email chain | AIG-004178 - AIG-004181 |

| | | |
|--------|---|--|
| PX-039 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: Tillage Commodities-SS&C forwarding Kelly April 20, 2017 email chain | AIG-004182 - AIG-004185 |
| PX-040 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: Tillage forwarding Spagnoletti September 18 2017 email chain | AIG-004243 - AIG-004245 |
| PX-041 | Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re [EXTERNAL] RE: Tillage: Claim Number 9774577298 US forwarding Wolfe April 2, 2019 email chain | AIG-004254 - AIG-004261 |
| PX-042 | Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re Tillage: Claim Number 9774577298 US forwarding Kelly February 27, 2019 email chain | AIG-004308 - AIG-004309 |
| PX-043 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: Tillage Commodities-SS&C forwarding Wolfe April 21, 2017 email chain | AIG-004314 - AIG-004320 |
| PX-044 | Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re 9774577298US FW: Tillage forwarding Wolfe August 2, 2017 email chain | AIG-004353 - AIG-004356 |
| PX-045 | Davis Polk Memorandum to K.A. Cappelluti re Tillage Commodities Fund L/P/ v. SS&C Technologies , Inc. Agreed-to-Litigation Plan | AIG-004463 - AIG-004472 |
| PX-046 | 4/30/2015 - 4/30/2016 Choice of Counsel Request 2015 | AIG-005196 - AIG-005200 |
| PX-047 | Email Chain from A. Peacock (AIG) to J. Kalustian (AIG) re SS&C (Update on Bradshaw matter) | AIG-005264 - AIG-005265 |
| PX-048 | Email Chain from M. Trokenheim (AIG) to J. Kalustian (AIG) re SS&C (Choice of Counsel Endorsement Request for 2015-2016 Manuscript Policy) (Including attachment: Choice of Panel or Scheduled Counsel Endorsement) | AIG-005272 - AIG-005276 |
| PX-049 | Email Chain from J. Niemczyk (AIG) to J. Kalustian (AIG) re SS&C Software Renewal 2015-2016 | AIG-005281 - AIG-005283 |
| PX-050 | Email Chain from J. Marshall-Tate (Willis Americas Administration) to J. Kalustian (AIG) re SS&C | AIG-005458 - AIG-005459; AIG-ESI-07681 - AIG-ESI-07682 |

| | | |
|--------|---|-------------------------------|
| PX-051 | AIG Specialty Risk Protector Specialty Professional Liability Insurance (SPL) | AIG-005531 - AIG-005535 |
| PX-052 | Chart Summarizing SS&C Policy Expiring 4/30/2016 | AIG-005691 - AIG-005694 |
| PX-053 | Letter from AIG to SS&C re Conditional Renewal Notice | AIG-005718 - AIG-005719 |
| PX-054 | AIG Letter to J. Marshall-Tate (Willis of Connecticut, LLC) re Cover Note Evidencing Insurance Placement Confirmation | AIG-005721 - AIG-005722 |
| PX-055 | AIG Loss Run Report | AIG-005778 - AIG-005793 |
| PX-056 | 4/30/2015-4/30/2016 Underwriting Analysis | AIG-005796 - AIG-005812 |
| PX-057 | AIG Claims (U.S.) - Claims Handling Standards | AIG-005919 - AIG-006001 |
| PX-058 | AIG property & Casualty Claims Handling Guidelines Issued on 7/2/2013 | AIG-006002 - AIG-006017 |
| PX-059 | AIG Property & Casualty Claims Handling Policy Issued on 7/2/2013 | AIG-006018 - AIG-006025 |
| PX-060 | Miscellaneous Professional Liability (MPL) Underwriting Methodology | AIG-006029 - AIG-006079 |
| PX-061 | Letter from AON to AIG re Tillage Commodity Fund - Wire | AIG-006080 - AIG-006082 |
| PX-062 | Letter from AIG to P. Igoe (SS&C) re Tillage Commodity Fund - Wire | AIG-006083 - AIG-006085 |
| PX-063 | Letter from AIG to P. Igoe (SS&C) re Claim 9774577298 US | AIG-006086 - AIG-006092 |
| PX-064 | Complaint (Docket. No. 2, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-006098 - AIG-006123 |
| PX-065 | Third-Party Summons and SS&C's Third-Party Complaint against Tillage (Docket. No. 40, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-006124 - AIG-006153 |
| PX-066 | Notes of Claim from 4/7/2016 to 8/28/2019 | AIG-006154 - AIG-006163 |
| PX-067 | Letter from K.A. Cappelluti (AIG) to P. Igoe (SS&C) re Claim No. 9774577298US | AIG-ESI-00034 - AIG-ESI-00040 |
| PX-068 | Affidavit of Chris Prettyman (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-ESI-00082 - AIG-ESI-00084 |
| PX-069 | Draft of Letter from K.A. Cappelluti (AIG) to P. Igoe (SS&C) re Claim No. 9774577298US | AIG-ESI-00105 - AIG-ESI-00110 |

| | | |
|--------|---|---------------------------------|
| PX-070 | AIG Letter to P. Igoe re Claim 9774577298US | AIG-ESI-00111 - AIG-ESI-00116 |
| PX-071 | SS&C Statement of Material Facts (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016) | AIG-ESI-00147 - AIG-ESI-00158 |
| PX-072 | Email Chain from K.A. Cappelluti (AIG) to C. Wolfe (AIG) re SS&C | AIG-ESI-00769 - AIG-ESI-00770 |
| PX-073 | Email from K.A. Cappelluti to FL-DropFile re PLEASE DISREGARD PREVIOUS ATTACHMENT. AIG Claim 9774577298us - Claimant: Tillage Commodity (including attachment: AIG Letter to P. Igoe re Claim 9774577298US) | AIG-ESI-00785 - AIG-ESI-00792 |
| PX-074 | Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re forwarding email from C. Wolfe to P. Igoe re SS&C-Claim Number 9774577298US (Tillage Matter) | AIG-ESI-00851 - AIG-ESI-00852 |
| PX-075 | Email from K.A. Cappelluti (AIG) to C. Wolfe (AIG) re SS&C (including attachment: AIG Letter to P. Igoe re Claim 9774577298US) | AIG-ESI-00874 - AIG-ESI-00880 |
| PX-076 | Email from K.A. Cappelluti (AIG) to D. Ruhlman (AIG) re SS&C Technologies Inc. Claims Update | AIG-ESI-01533 - AIG-ESI-01536 |
| PX-077 | Decision and Order on Motion to Dismiss (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | AIG-ESI-01675 - AIG-ESI-01680 |
| PX-078 | Email Chain from C. Wolfe to K.A. Cappelluti re SS&C Claim Number 9774577298US | AIG-ESI-01747 - AIG-ESI-01749 |
| PX-079 | Email Chain from C. Wolfe to K.A. Cappelluti (AIG) re Tillage v. SS&C: Claim Number 9774577298 US | AIG-ESI-01812 - AIG-ESI-01814 |
| PX-080 | Email Chain from K.A. Cappelluti (AIG) to C. Wolfe re SS&C Claim Number 9774577298US | AIG-ESI-02118 - AIG-ESI-02124 |
| PX-081 | Email Chain from K.A. Cappelluti to P. Igoe re Tillage | AIG-ESI-03029; SS&C-COV-0046238 |
| PX-082 | Email from K.A. Cappelluti (AIG) to D. Ruhlman (AIG) re SS&C Technologies Inc. Claims Update | AIG-ESI-03076 - AIG-ESI-03078 |
| PX-083 | Email from A. Duque to K.A. Cappelluti (AIG) re SS&C Technologies Inc. Claims Update | AIG-ESI-03203 - AIG-ESI-03204 |
| PX-084 | Email Chain from P. Spagnoletti to C. Wolfe and K.A. Cappelluti (AIG) re Tillage: Claim Number 9774577298 US/Settlement | AIG-ESI-03308 - AIG-ESI-03310 |

| | | |
|--------|---|--|
| PX-085 | Email Chain from A. Roxland to C. Wolfe (AIG) and K.A. Cappelluti re SS&C Claim Number 9774577298US | AIG-ESI-03887 - AIG-ESI-03891 |
| PX-086 | Email Chain from K.A. Cappelluti (AIG) to G. Sligman re SS&C Technologies/Tillage Commodity Fund - 9774577298US | AIG-ESI-03971 - AIG-ESI-03982 |
| PX-087 | Email Chain from K.A. Cappelluti to P. Spagnoletti re AIG Claim 9774577298us - Claimant: Tillage Commodity | AIG-ESI-05184 - AIG-ESI-05186 |
| PX-088 | Email from P. Igoe (SS&C) to K.A. Cappelluti (AIG) re Tillage Negotiations | AIG-ESI-05431; SS&C-COV-0046237 |
| PX-089 | Email Chain from C. Wolfe (AIG) to K.A. Cappelluti (AIG) re [EXTERNAL] Re: Tillage: Claim Number 9774577298 US | AIG-ESI-05702 - AIG-ESI-05707 |
| PX-090 | Email from C. Wolfe (AIG) to A. Roxland and K.A. Cappelluti (AIG) re SS&C Claim Number 9774577298US | AIG-ESI-05954 - AIG-ESI-05956; AIG-ESI-10751 - AIG-ESI-10753 |
| PX-091 | Email Chain from C. Wolfe to K.A. Cappelluti (AIG) re Tillage Commodities-SS&C | AIG-ESI-06029 - AIG-ESI-06033 |
| PX-092 | Email Chain from A. Roxland (AON) to R. Lindsley re 9774577298US Tillage Commodity Fund - SS&C | AIG-ESI-06221 - AIG-ESI-06222 |
| PX-093 | Email Chain from K.A. Cappelluti (AIG) to C. Wolfe (AIG) re SS&C/Tillage - AIG Claim #9774577298US | AIG-ESI-06668 - AIG-ESI-06669 |
| PX-094 | Email Chain from K.A. Cappelluti (AIG) to G. Seligman re Insured: SS&C Technologies / Tillage Commodities Fund - 9774577298US | AIG-ESI-06673 - AIG-ESI-06683 |
| PX-095 | Email Chain from C. Wolfe to K.A. Cappelluti (AIG) re Tillage | AIG-ESI-06788 - AIG-ESI-06790 |
| PX-096 | Email Chain from M. Kelly (Davis Polk) to C. Wolfe and K.A. Cappelluti (AIG) re SS&C Claim Number 9774577298US | AIG-ESI-06796 - AIG-ESI-06801 |
| PX-097 | Draft of AIG Specialty Risk Protector Specialty Professional Liability Insurance (SPL) | AIG-ESI-07230 - AIG-ESI-07234 |
| PX-098 | Draft of 4/30/2015-4/30/2016 Underwriting Analysis | AIG-ESI-07406 - AIG-ESI-07422 |
| PX-099 | Draft of 4/30/2015-4/30/2016 Underwriting Analysis | AIG-ESI-07426 - AIG-ESI-07442 |
| PX-100 | Email chain from J. Marshall-Tate (FINEX North America) to J. Kalustian (AIG) re SS&C | AIG-ESI-07443 - AIG-ESI-07444 |
| PX-101 | Email from S. Krusko (AIG) to J. Kalustian (AIG) re SS&C (4/30/2015 Renewal Approval Referral) | AIG-ESI-07678 |

| | | |
|--------|--|-------------------------------|
| PX-102 | Email from J. Kalustian to A. Peacock re SS&C | AIG-ESI-07707 |
| PX-103 | Email Chain from K. Crowley to J. Kalustian to re SS&C | AIG-ESI-07749 - AIG-ESI-07750 |
| PX-104 | Email chain from J. Kalustian to J. Niemczyk re SS&C Software Renewal 2015-2016 | AIG-ESI-07855 - AIG-ESI-07857 |
| PX-105 | Email from J. Kalustian (AIG) to A. Menier (AIG) re SS&C (Renewal Approval Referral) | AIG-ESI-08142 |
| PX-106 | Email Chain from A. Roxland (AON) to R. Lindsley re 9774577298US Tillage Commodity Fund - SS&C | AIG-ESI-08221 - AIG-ESI-08222 |
| PX-107 | SS&C letter to Hong Kong Police Force re Fraud Report | AIG-ESI-08232 |
| PX-108 | Email Chain from A. Roxland to A. Roxland forwarding P. Igie email to R. Reichman dated March 28, 2016 re Tillage/SS&C call | AIG-ESI-08277 - AIG-ESI-08231 |
| PX-109 | Email from L. Raymond (AIG) to P. Igoe (SS&C) re 9774577298US Tillage Commodity Fund - Wire | AIG-ESI-08361 |
| PX-110 | Email from C. Wolfe (AIG) to C. Wolfe re 2019 Achievements | AIG-ESI-08400 - AIG-ESI-08401 |
| PX-111 | Email Chain from C. Wolfe to K.A. Cappelluti re SS&C/Tillage - AIG Claim #9774577298US | AIG-ESI-08806 - AIG-ESI-08807 |
| PX-112 | Email from K.A. Cappelluti (AIG) to C. Wolfe re SS&C | AIG-ESI-10213 |
| PX-113 | Draft of letter from AIG to P. Igoe re Claim No. 9774577298us (attachment to email from K.A. Cappelluti (AIG) to C. Wolfe re SS&C) | AIG-ESI-10214 - AIG-ESI-10219 |
| PX-114 | Email Chain from E. Schoenwolff to C. Wolfe re Notice - SS&C (Tillage Commodities Fund - Wire) E&O | AIG-ESI-10293 - AIG-ESI-10294 |
| PX-115 | Email Chain from C. Wolfe (AIG) to E. Schoenwolff re Notice - SS&C (Tillage Commodities Fund - Wire) E&O | AIG-ESI-10731 - AIG-ESI-10732 |
| PX-116 | Email Chain from C. Wolfe to K.A. Cappelluti (AIG) re SS&C Claim Number 9774577298US | AIG-ESI-10754 - AIG-ESI-10760 |
| PX-117 | Email from A. Roxland (AON) to K.A. Cappelluti (AIG) re SS&C - Tillage | AIG-ESI-10791 |
| PX-118 | Email Chain from E. Monfort (AIG) to K.A. Cappelluti (AIG) re SS&C Claim Update | AIG-ESI-11116 - AIG-ESI-11117 |
| PX-119 | Email from C. Wolfe (AIG) to K.A. Cappelluti (AIG) re SS&C Claim Number 9774577298US | AIG-ESI-11769 - AIG-ESI-11770 |
| PX-120 | Email from C. Wolfe (AIG) to K.A. Cappelluti (AIG) re 9774577298US-001 successfully Re-assigned to KRIS ANN CAPPELLUTI. SS&C Tech/NY | AIG-ESI-12116 |

| | | |
|--------|---|-------------------------------------|
| PX-121 | Email Chain from C. Wolfe (AIG) to K.A. Cappelluti (AIG) re SS&C-Tillage (claim 9774577298US) | AIG-ESI-12117 - AIG-ESI-12118 |
| PX-122 | Email Chain from A. Cerroni (SS&C) to T. Funk (Tillage) re Financial Fraud Report (including attachment) | SS&C-COV-0000190 - SS&C-COV-0000203 |
| PX-123 | Affidavit of Matthew Balemian (Docket. No. 141, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | SS&C-COV-0007766 - SS&C-COV-0007771 |
| PX-124 | SS&C's Memorandum of Law in Support of its Motion for Summary Judgment (Docket. No. 137, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | SS&C-COV-0007995 - SS&C-COV-0008022 |
| PX-125 | Confidential Settlement and Release Agreement between Tillage Commodities Fund L.P., Tillage Commodities, LLC, Tillage Commodities Management, LLC, Tillage General Partner, the Tillage Fund and SS&C Technologies, Inc. | SS&C-COV-0016777 - SS&C-COV-0016788 |
| PX-126 | Email Chain from T. Funk (Tillage) to T. Martocci (SS&C) re Today Wire Transfer Requests (including attachments) | SS&C-COV-0022539 - SS&C-COV-0022550 |
| PX-127 | Email Chain from SSCIndiaWireGroup to T. Martocci re Nonpriority/Tillage Commodities/Investment Capital/First Republic Bank/1 wire | SS&C-COV-0034618 - SS&C-COV-0034619 |
| PX-128 | Email Chain from K.A. Cappelluti to P. Igoe et al re Tillage | SS&C-COV-0046231 - SS&C-COV-0046232 |
| PX-129 | Email Chain from K.A. Cappelluti to P. Igoe re Tillage | SS&C-COV-0046239 |
| PX-130 | Email Chain from P. Spagnoletti to K.A. Cappelluti (AIG) re Tillage | SS&C-COV-0046323 |
| PX-131 | Financial Institution Bond Form (unfilled) | |
| PX-132 | Letter from AIG to P. Igoe (SS&C) re Claim No. 4299248640US (James Bradshaw) | SS&C-COV-0048697 - SS&C-COV-0048702 |
| PX-133 | Summary of Davis Polk Invoices to SS&C for professional services from May 2016 to November 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048946 |
| PX-134 | Davis Polk Invoice to SS&C for professional services ending April 30, 2016 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048947 - SS&C-COV-0048951 |

| | | |
|--------|--|--|
| PX-135 | Davis Polk Invoice to SS&C for professional services ending May 31, 2016 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048952 - SS&C-COV-0048955 |
| PX-136 | Davis Polk Invoice to SS&C for professional services ending June 30, 2016 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048956 - SS&C-COV-0048959 |
| PX-137 | Davis Polk Invoice to SS&C for professional services ending July 31, 2016 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048960 - SS&C-COV-0048965 |
| PX-138 | Davis Polk Invoice to SS&C for professional services ending August 31, 2016 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048966 - SS&C-COV-0048969 |
| PX-139 | Davis Polk Invoice to SS&C for professional services ending September 30, 2016 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048970 - SS&C-COV-0048976 |
| PX-140 | Davis Polk Invoice to SS&C for professional services ending October 31, 2016 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048977 - SS&C-COV-0048988 |
| PX-141 | Davis Polk Invoice to SS&C for professional services ending November 30, 2016 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048989 - SS&C-COV-0048997 |
| PX-142 | Davis Polk Invoice to SS&C for professional services ending December 31, 2016 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0048998 - SS&C-COV-0049007 |
| PX-143 | Davis Polk Invoice to SS&C for professional services ending January 31, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049008 - SS&C-COV-0049022 |
| PX-144 | Davis Polk Invoice to SS&C for professional services ending February 28, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049023 - SS&C-COV-0049034 |
| PX-145 | Davis Polk Invoice to SS&C for professional services ending March 31, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049035 - SS&C-COV-0049044 |

| | | |
|--------|--|--|
| PX-146 | Davis Polk Invoice to SS&C for professional services ending April 30, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049045 - SS&C-COV-0049061 |
| PX-147 | Davis Polk Invoice to SS&C for professional services ending April 30, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049062 - SS&C-COV-0049078 |
| PX-148 | Davis Polk Invoice to SS&C for professional services ending May 31, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049079 - SS&C-COV-0049097 |
| PX-149 | Davis Polk Invoice to SS&C for professional services ending June 30, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049098 - SS&C-COV-0049114 |
| PX-150 | Davis Polk Invoice to SS&C for professional services ending July 31, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049115 - SS&C-COV-0049128 |
| PX-151 | Davis Polk Invoice to SS&C for professional services ending August 31, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049129 - SS&C-COV-0049139 |
| PX-152 | Davis Polk Invoice to SS&C for professional services ending September 30, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049140 - SS&C-COV-0049148 |
| PX-153 | Davis Polk Invoice to SS&C for professional services ending October 31, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049149 - SS&C-COV-0049159 |
| PX-154 | Davis Polk Invoice to SS&C for professional services ending November 30, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049160 - SS&C-COV-0049175 |
| PX-155 | Davis Polk Invoice to SS&C for professional services ending December 31, 2017 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049176 - SS&C-COV-0049190 |
| PX-156 | Davis Polk Invoice to SS&C for professional services ending January 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049191 - SS&C-COV-0049211 |

| | | |
|--------|--|--|
| PX-157 | Davis Polk Invoice to SS&C for professional services ending February 28, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049212 - SS&C-COV-0049228 |
| PX-158 | Davis Polk Invoice to SS&C for professional services ending March 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049229 - SS&C-COV-0049242 |
| PX-159 | Davis Polk Invoice to SS&C for professional services ending April 30, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049243 - SS&C-COV-0049255 |
| PX-160 | Davis Polk Invoice to SS&C for professional services ending May 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049256 - SS&C-COV-0049274 |
| PX-161 | Davis Polk Invoice to SS&C for professional services ending June 30, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049275 - SS&C-COV-0049295 |
| PX-162 | Davis Polk Invoice to SS&C for professional services ending July 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049296 - SS&C-COV-0049310 |
| PX-163 | Davis Polk Invoice to SS&C for professional services ending August 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049311 - SS&C-COV-0049314 |
| PX-164 | Davis Polk Invoice to SS&C for professional services ending August 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049315 - SS&C-COV-0049330 |
| PX-165 | Davis Polk Invoice to SS&C for professional services ending September 30, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049331 - SS&C-COV-0049334 |
| PX-166 | Davis Polk Invoice to SS&C for professional services ending September 30, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049335 - SS&C-COV-0049351 |
| PX-167 | Davis Polk Invoice to SS&C for professional services ending October 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049352 - SS&C-COV-0049355 |

| | | |
|--------|---|--|
| PX-168 | Davis Polk Invoice to SS&C for professional services ending October 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049356 - SS&C-COV-0049375 |
| PX-169 | Davis Polk Invoice to SS&C for professional services ending November 30, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049376 - SS&C-COV-0049379 |
| PX-170 | Davis Polk Invoice to SS&C for professional services ending November 30, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049380 - SS&C-COV-0049396 |
| PX-171 | Davis Polk Invoice to SS&C for professional services ending December 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049397 - SS&C-COV-0049400 |
| PX-172 | Davis Polk Invoice to SS&C for professional services ending December 31, 2018 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049401 - SS&C-COV-0049415 |
| PX-173 | Davis Polk Invoice to SS&C for professional services ending January 31, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049416 - SS&C-COV-0049420 |
| PX-174 | Davis Polk Invoice to SS&C for professional services ending January 31, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049421 - SS&C-COV-0049434 |
| PX-175 | Davis Polk Invoice to SS&C for professional services ending February 28, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049435 - SS&C-COV-0049438 |
| PX-176 | Davis Polk Invoice to SS&C for professional services ending February 28, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049439 - SS&C-COV-0049454 |
| PX-177 | Davis Polk Invoice to SS&C for professional services ending March 31, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049455 - SS&C-COV-0049458 |
| PX-178 | Davis Polk Invoice to SS&C for professional services ending March 31, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049459 - SS&C-COV-0049473 |

| | | |
|--------|--|-------------------------------------|
| PX-179 | Davis Polk Invoice to SS&C for professional services ending April 30, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049474 - SS&C-COV-0049477 |
| PX-180 | Davis Polk Invoice to SS&C for professional services ending April 30, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049478 - SS&C-COV-0049502 |
| PX-181 | Davis Polk Invoice to SS&C for professional services ending June 26, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049503 - SS&C-COV-0049506 |
| PX-182 | Davis Polk Invoice to SS&C for professional services ending June 26, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049507 - SS&C-COV-0049536 |
| PX-183 | Davis Polk Invoice to SS&C for professional services ending October 31, 2019 in connection with potential claims by Tillage Commodities Management | SS&C-COV-0049537 - SS&C-COV-0049540 |
| PX-184 | Amended Complaint (James Bradshaw, et al v. Stephen Maiden et al, General Court of Justice, Superior Court Division, State of North Carolina, County of Mecklenburg, Docket No. 14-CVS-14445) | |
| PX-185 | Email Chain from C. Wolfe (AIG) to FL-Drop File re Notice - SS&C (Tillage Commodities Fund - Wire) E&O - PLEADING ATTACHED Claim 9774577298US | AIG-ESI-06986 - AIG-ESI-06987 |
| PX-186 | Memorandum of Law in Support of Defendant's to Motion to Dismiss (Docket. No. 7, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | |
| PX-187 | Reply Memorandum of Law in Support of Defendant's Motion to Dismiss (Docket. No. 29, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | |
| PX-188 | Letter from AIG to P. Igoe (SS&C) re Claim No. 4299248340US (James Bradshaw) | SS&C-COV-0048693 - SS&C-COV-0048696 |
| PX-189 | Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment (Docket. No. 175, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | |

| | | |
|--------|---|-------------------------------------|
| PX-190 | Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment (Docket. No. 188, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | |
| PX-191 | Memorandum of Law in Further Support of Tillage Commodities Management, LLC's Motion for Summary Judgment (Docket. No. 214, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | |
| PX-192 | SS&C Reply Memorandum of Law in Further Support of Its Motion for Summary Judgment (Docket. No. 218, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | |
| PX-193 | SS&C Memorandum of Law in Opposition to Tillage Management's Motion for Summary Judgment (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | |
| PX-194 | Reply Memorandum of Law in Further Support of Tillage Commodities Management, LLC Motion for Summary Judgment (Docket. No. 242, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | |
| PX-195 | Email Chain from P. Spagnoletti to L. Solbakken re Tillage/Settlement Communication | SS&C-COV-0016821 - SS&C-COV-0016823 |
| PX-196 | Stipulation and Order on Settlement (Docket. No. 248, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York) | |
| PX-197 | AIG Specialty Insurance Company's Responses to Plaintiff's First Set of Requests for Admission | |
| PX-198 | Letter from Ryan McCartney to Alex Reisen re Tillage Commodities Fund, L.P. v. SS&C Technologies, Inc. (Index No. 654765/2016) | |
| PX-199 | Summary of Invoices related to Tillage Action | |
| PX-200 | Summary of Invoices related to the instant litigation | |
| PX-201 | Email Chain from P. Spagnoletti to C. Wolfe re Tillage Claim | AIG-ESI-01828-AIG-ESI01829 |

Plaintiff may introduce some or all of the exhibits on this Exhibit List. Plaintiff reserves the right to supplement or amend their Exhibit List in light of AIG's objections and AIG's list of exhibits. Plaintiff also reserves the right to supplement or amend their Exhibit List based, among other things, on the Court's summary judgment, pre-trial, and trial evidentiary rulings; the ongoing discovery in this action or otherwise; and the arguments and evidence offered by AIG in their case-in-chief. This Exhibit List does not include documents that Plaintiffs may use for cross examination, for impeachment, to refresh recollection, or in rebuttal. This Exhibit List does not include demonstrative exhibits, and Plaintiffs reserve their right to offer into evidence summary, blow-up, handout, or composite exhibits. In additional, Plaintiffs reserve the right to introduce any exhibit on AIG's list of exhibits. The inclusion of exhibits on this Exhibit List does not waive any objections available under the Federal Rules of Evidence or otherwise that Plaintiff may have to the introduction of such exhibit if offered by AIG. The inclusion of any exhibit on this list does not waive and is subject to all motions in limine and motions for summary judgment, which, if granted, may result in the deletion and/or redaction of certain exhibits as appropriate.

Dated: New York, New York
January 22, 2019

McKool Smith, P.C.

By: /s/ Robin L. Cohen
Robin L. Cohen
(rcohen@mckoolsmith.com)
James H. Smith
(jsmith@mckoolsmith.com)
One Bryant Park, 47th Floor
New York, NY 10036
Telephone: (212) 402-9400
Facsimile: (212) 402-9444

*Attorneys for Plaintiff SS&C Technologies
Holdings, Inc.*